

EXHIBIT B

808. Do I need a specific license from OFAC to file a suit in U.S. court against a person designated or blocked pursuant to Venezuela-related sanctions? Does a U.S. court, or its personnel, need a specific license from OFAC to hear such a case?

Answer

No. A specific license from OFAC is not ordinarily required to initiate or continue U.S. legal proceedings against a person designated or blocked pursuant to ~~OFAC's the Venezuela sanctions program, Sanctions Regulations, 31 CFR part 591 (VSR)~~, or for a U.S. court, or its personnel, to hear such a case. Similarly, creditors may file for writs of attachment without the need for OFAC authorization for matters involving property blocked under the VSR.

However, a specific license from OFAC is required for the entry into a settlement agreement, or for the enforcement of any lien, judgment, or other order through execution, garnishment, or other judicial process purporting to transfer or otherwise alter or affect property or interests in property blocked pursuant to the ~~Venezuela Sanctions Regulations (31 C.F.R. Part 591)~~. This includes the purported creation or perfection of any legal or equitable interests (including contingent or inchoate interests) in blocked property. While terminology may vary in different jurisdictions and proceedings, a specific license from OFAC would be required for measures such as: VSR.

Taking Possession (Actual or Constructive)

- Seizing
- Levying Upon
- Attaching
- Encumbering
- Pledging
- Conveying
- Selling (Final or Contingent)
- Freezing
- Assuming or Maintaining Custody
- Sequestering

For additional information, see 31 C.F.R. CFR §§ 591.309, 591.310, 591.407 and 591.506.

With respect to the specific facts and circumstances in Crystalex Int'l Corp. v. Bolivarian Republic of Venezuela, 17-mc-00151, before the U.S. District Court for the District of Delaware, please see Frequently Asked Question (FAQ) 1123. For information on general licenses that

may authorize certain settlement negotiations involving persons designated or blocked pursuant to the VSR, please see OFAC FAQs 1124 and 1125.